

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA BROWN, M.D., )  
Plaintiff, )  
v. ) Civil Action No. 05-32 E  
HAMOT MEDICAL CENTER, )  
Defendant. )

JOINT MOTION TO EXTEND DISCOVERY

The parties hereby move the court for a 60 day extension of discovery, and state the following in support.

1. This is an action for employment discrimination and for breach of contract.
2. In its June 21, 2005 Case Management Order, the court set the deadline for fact discovery at October 14, 2005.
3. Before the court issued its Case Management Order, and since that time, the parties have been engaging in discovery. For example, Hamot has produced over a thousand pages of documents, and counsel have taken five depositions. Additional documents need to be obtained by both sides, and additional depositions have been discussed by counsel, but have not yet been noticed. Some of the depositions remaining involve medical doctors who have rigid work schedules.
4. Counsel have a continuing disagreement over the scope of the documents discoverable from Hamot. Counsel have attempted to work out this dispute, and have

resolved other discovery disputes, but court intervention is almost certainly necessary on this issue, for which a motion to compel will be filed shortly.

5. Plaintiff believes it is important to have the documents mentioned above before taking depositions of certain key Hamot witnesses.

6. There have been no previous extensions of discovery.

Accordingly, the parties request that the court grant their Motion to Extend Discovery. A proposed order following the form of the court's previous case management order, with new dates inserted, is attached.

Respectfully submitted,

Leech Tishman Fuscaldo & Lampl, LLC

/s/ Patrick Sorek  
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Counsel for plaintiff

Tobin O'Connor Ewing & Richard

/s/ Ziad Haddad by PS with permission  
Kerry M. Richard  
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Counsel for defendant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Motion to Extend Discovery was served today by facsimile and first class mail, postage prepaid, on:

Kerry M. Richard  
Ziad Haddad  
Tobin O'Connor Ewing & Richard  
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\_\_\_\_\_  
Date 10/12/05

\_\_\_\_\_  
/s/ Patrick Sorek  
Patrick Sorek